

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

LINDA STERMER,

Petitioner,

-v-

Case No. 2:12-CV-14013
HON. ARTHUR J. TARNOW

MILLICENT WARREN,

Respondent.

**PETITIONER'S MOTION TO LIFT STAY UPON
CONCLUSION OF STATE COURT PROCEEDINGS**

Petitioner LINDA STERMER, by and through her attorney, SHELDON HALPERN, moves this Court to Lift the Stay of Proceedings and permit filing of the contemporaneously filed Amended Petition and Brief in Support and permit prosecution of her claims, and states further:

1. In compliance with this Court's Order of December 12, 2012, and granted extensions, holding the Petition in Abeyance to permit return to the Michigan trial and appellate courts to exhaust issues.
2. The Order also directed Petitioner to file a Motion to lift the stay and an Amended Petition within 60 days after the conclusion of the state court proceedings.
3. On November 23, 2015, the Michigan Supreme Court denied leave to appeal.
4. Petitioner's claims have now been exhausted and may now be presented

for determination by this Court. *Rhines v. Weber*, 544 U.S. 269, 275-76 (2005).

WHEREFORE, Petitioner moves this Court to Lift the Stay of Proceedings, accept the contemporaneously filed Amended Petition and Brief in Support, and issue an Order setting forth time limits for Respondent's Answer and Petitioner's Reply, plus any and all other relief deemed necessary and just.

Respectfully submitted,

/s/ SHELDON HALPERN
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Dated: January 23, 2016.